

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA MATARAZZO,

Plaintiff,

v.

CIVIL ACTION NO.

2:11-cv-05439-JD

EQUIFAX INFORMATION
SERVICES LLC,

Defendant.

:

DECLARATION OF VICKI BANKS

I, Vicki Banks, hereby make this Declaration under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Vicki Banks. I am over 21 years of age, have personal knowledge of the matters stated herein, and am otherwise competent to give this Declaration.
2. I am currently employed as a Senior Consumer Research Analyst II with Equifax Information Services LLC ("EIS").
3. I reside and work in Atlanta, Georgia. My business address is 1550 Peachtree Street, Atlanta, Georgia 30309.
4. I have been employed by EIS for more than 14 years.

5. I am aware that EIS is a defendant in the above-styled lawsuit brought by Lisa Matarazzo ("Plaintiff"). I have reviewed Plaintiff's Complaint and am generally familiar with the allegations made therein.

6. I have authority to submit this Declaration on behalf of EIS and in support of its Motion to Transfer Venue to the United States District Court for the Northern District of Georgia, Atlanta Division, or, in the Alternative, to Dismiss.

7. EIS is a Georgia limited liability company with its principal place of business in Atlanta, Georgia. Its headquarters are located at 1550 Peachtree Street, Atlanta, Georgia 30309.

8. EIS does not maintain offices in Pennsylvania for handling consumer credit files or investigating consumer disputes.

9. EIS's consumer-reporting database, in which all of the data EIS uses for preparing consumer credit reports, is located in Atlanta, Georgia.

10. Credit reports and other information regarding consumers, including Plaintiff, are issued to inquiring companies from the Atlanta database.

11. EIS's policies and procedures for maintaining the accuracy of its credit reports, including the accuracy of information obtained from public records, are developed and implemented in Atlanta, Georgia.

12. EIS's policies and procedures for handling consumer credit files and investigating consumer disputes are developed and implemented in Atlanta, Georgia.

13. EIS's policies and procedures related to the consumer notifications required by § 1681k(a)(1) of the Fair Credit Reporting Act (Title 15) were developed and implemented by EIS in Atlanta, Georgia.

14. All of EIS's witnesses and documents associated with its policies and procedures, as well as with Plaintiff's individual case, are also located in Atlanta.

15. EIS does not maintain a consumer database, or an office related to consumer affairs, in Pennsylvania.

16. No representatives of EIS had any communications with Plaintiff, or her potential employers, by telephone, U.S. mail, electronic mail, or any other means in Pennsylvania, and EIS knows of no material witnesses with knowledge of the allegations in the complaint that reside and/or work in Pennsylvania.

17. I have reviewed EIS's records concerning Plaintiff's credit file, which is stored in Equifax's consumer database in Atlanta.

18. These records reflect that Plaintiff currently resides in Sewall, New Jersey.

19. All credit reports issued by EIS regarding Plaintiff were assembled and maintained in EIS's consumer database in Atlanta.

20. In the past three years, EIS has not provided any consumer credit reports regarding Plaintiff to any entities located in Pennsylvania.

21. No representatives of EIS conducted or participated in any meetings in Pennsylvania with Plaintiff or her representatives, nor did EIS's representatives have any material communications with Plaintiff or her representatives by telephone, U.S. mail, electronic mail, or any other means in Pennsylvania.

22. To EIS's knowledge, none of the events associated with this lawsuit occurred in Pennsylvania.

23. EIS is not aware of any document relevant to this case that was created, received, executed, or currently maintained in Pennsylvania.

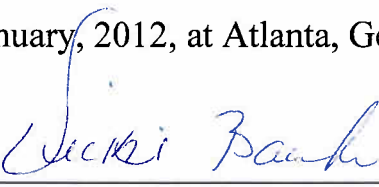
24. All EIS employees, documents, and data associated with this lawsuit are located in Atlanta, Georgia.

25. The EIS employees who would testify regarding its policies and procedures, including its policies and procedures related to § 1681k(a)(1) of the FCRA, are located in or near Atlanta, Georgia.

26. The EIS employees who would testify regarding Plaintiff's credit file, credit reports, and § 1681k(a)(1) notices are located in or near Atlanta, Georgia.

I have reviewed this Declaration and declare under penalty of perjury that the foregoing statements are true to the best of my knowledge and belief.

Dated this 31st day of January, 2012, at Atlanta, Georgia

By: 
Vicki Banks